1	Juli E. Farris (CSB No. 141716)	John C. Dwyer (CSB No. 136533)
2	jfarris@kellerrohrback.com KELLER ROHRBACK L.L.P.	dwyerjc@cooley.com COOLEY GODWARD KRONISH LLP
_	1201 Third Avenue, Suite 3200	Five Palo Alto Square
3	Seattle, WA 98101	3000 El Camino Real
4	Telephone: (206) 623-1900	Palo Alto, CA 94306
4	Facsimile: (206) 623-3384	Telephone: (650) 843-5000 Facsimile: (650) 857-0663
5	Attorneys for Lead Plaintiff Gerald del Rosario	1 desimile. (030) 037 0003
_		Attorneys for Defendant Levy Gerzberg
6	Susan S. Muck (CSB No. 126930)	John Hamann (CCD No. 165022)
7	smuck@fenwick.com FENWICK & WEST LLP	John Hemann (CSB No. 165823) jhemann@morganlewis.com
	555 California Street, Suite 1200	MORGAN, LEWIS & BOCKIUS LLP
8	San Francisco, CA 94104	One Market, Spear Street Tower
	Telephone: (415) 875-2300	San Francisco, CA 95104
9	Facsimile: (415) 281-1350	Telephone: (415) 442-1000
10		Facsimile: (415) 442-1001
10	Attorneys for Defendants Uzia Galil, Raymond	Attornous for Defendant Varl Schneiden
11	A. Burgess, James D. Meindl, James B. Owens, Jr., and Arthur B. Stabenow	Attorneys for Defendant Karl Schneider
**	J., and Hill B. Statellow	Sara B. Brody (CSB No. 130222)
12	Steven S. Kaufhold (CSB No. 157195)	sara.brody@hellerehrman.com
	skaufhold@akingump.com	HELLEŘ EHRMAN LLP
13	AKIN GUMP STRÅUSS HAUER & FELD	333 Bush Street
	LLP	San Francisco, CA 94104
14	580 California, Suite 1500	Telephone: (415) 772-6000
15	San Francisco, CA 94101 Telephone: (415) 765-9500	Facsimile: (415) 772-6268
13	Facsimile: (415) 765-9501	Attorneys for Defendant Camillo Martino
16		
17	Attorneys for Nominal Defendant Zoran	
17	Corporation	
18		
	UNITED STATES	DISTRICT COURT
19		CT OF CALIFORNIA
20	SAN FRANCIS	SCO DIVISION
20		
21	IN RE ZORAN CORPORATION	No. CV 06-05503 WHA
-1	DERIVATIVE LITIGATION	110. 6 7 00 05505 11111
22		DERIVATIVE ACTION
22		
23	This Document Relates To:	STIPULATION AND [PROPOSED] ORDER EXTENDING FACT
24	This Document Relates 10.	DISCOVERY DEADLINE BY TWO
-	ALL ACTIONS	WEEKS
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STIPULATION AND [PROPOSED] ORDER EXTENDING FACT DISCOVERY DEADLINE BY TWO WEEKS

CV 06-05503 WHA

1	WHEREAS, counsel for the Parties have conferred regarding the schedule in this Action		
2	WHEREAS, Fed. R. Civ. P. 30(a) limits each Party to 10 depositions, absent stipulation		
3	or leave of Court;		
4	WHEREAS, Plaintiff to date has taken or scheduled 13 depositions, including non-party		
5	witnesses, and the Parties have stipulated that Plaintiff may exceed the prescribed limit of		
6	depositions to take those depositions;		
7	WHEREAS, Plaintiff seeks to depose an additional four witnesses – David Rynne, Jam		
8	Meindl, James Owens, and Phil Young – and also seeks to continue the deposition of Raymond		
9	Burgess, who was previously deposed;		
10	WHEREAS, the Parties have agreed that Plaintiff may take the depositions of Messrs.		
11	Meindl, Owens and Burgess, and are in negotiations over date, location, method, and duration of		
12	these depositions;		
13	WHEREAS, the Parties have also exchanged written discovery requests, including		
14	interrogatories, responses to which are due shortly;		
15	WHEREAS, pursuant to the Court's April 21, 2008 Order, the current deadline for		
16	completion of fact discovery is May 30, 2008;		
17	WHEREAS, the Parties agree that a two-week extension of the discovery deadline is		
18	needed to facilitate the scheduling and orderly completion of depositions and written discovery		
19	WHEREAS, no other dates will be affected by this Stipulation if approved by the Court		
20	NOW, THEREFORE, the Parties hereby stipulate that the time period for the Parties to		
21	complete fact discovery will be extended by two weeks until June 13, 2008.		
22			
23	May 15, 2008 /s/ <u>Juli E. Farris</u> <u>Juli E. Farris</u> (CA Bar No. 141716)		
24	jfarris@kellerrohrback.com KELLER ROHRBACK L.L.P.		
25	1201 Third Avenue, Suite 3200 Seattle, WA 98101		
26	Telephone: (206) 623-1900 Facsimile: (206) 623-3384		
27	Attorneys for Lead Plaintiff Gerald del Rosario		
,	Anorneys for Leaa Fianniff Geraia dei Rosario		

1	May 15, 2008	/s/ Susan S. Muck
2		Susan S. Muck (CSB No. 126930) smuck@fenwick.com
		FENWICK & WEST LLP
3		555 California Street, Suite 1200 San Francisco, CA 94104
4		Telephone: (415) 875-2300
5		Facsimile: (415) 281-1350
5		Attorneys for Defendants Uzia Galil, Raymond A. Burgess,
6		James D. Meindl, James B. Owens, Jr., and Arthur B. Stabenow
7		Siddenow
8	May 15, 2008	/s/ Steven S. Kaufhold Steven S. Keyfield (CSP, No. 157105)
0		Steven S. Kaufhold (CSB No. 157195) skaufhold@akingump.com
9		skaufhold@akingump.com AKIN GUMP STRAUSS HAUER & FELD LLP
10		580 California, Suite 1500 San Francisco, CA 94101
		Telephone: (415) 765-9500
11		Facsimile: (415) 765-9501
12		Attorneys for Nominal Defendant Zoran Corporation
13		
13	May 15, 2008	/s/ John C. Dwyer
14		John C. Dwyer (CSB No. 136533)
15		dwyerjc@cooley.com COOLEY GODWARD KRONISH LLP
		Five Palo Alto Square
16		3000 El Camino Real Palo Alto, CA 94306
17		Telephone: (650) 843-5000
10		Facsimile: (650) 857-0663
18		
19		Attorneys for Defendant Levy Gerzberg
20		
	May 15, 2008	/s/ John Hemann
21		John Hemann (CSB No. 165823) jhemann@morganlewis.com
22		MORGAN, LEWIS & BOCKIUS LLP
23		One Market, Spear Street Tower San Francisco, CA 95104
23		Telephone: (415) 442-1000
24		Facsimile: (415) 442-1001
25		Attorneys for Defendant Karl Schneider
26		
27		
28		

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May 15, 2008 /s/ Sara B. Brody Sara B. Brody (CSB No. 130222) sara.brody@hellerehrman.com HELLEŘ EHRMAN LLP 333 Bush Street San Francisco, CA 94104 Telephone: (415) 772-6000 Facsimile: (415) 772-6268 Attorneys for Defendant Camillo Martino PURSUANT TO THE ABOVE STIPULATION, IT IS SO CREATERS D DATED:_May 20, 2008 Honorat United \$